



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

JUL 28 2016

CERTIFIED MAIL 7015 1730 0001 8044 3798

RETURN RECEIPT REQUESTED

Mr. Drew Griffin
Manager, City of Florence
324 West Evans Street
Florence, South Carolina 29501-3456

Re: Gravity Sewer Mains Preventative Maintenance Program
Town of Timmonsville and City of Florence Consent Decree
Civil Action No. 4:13-cv-01522-RBH

Dear Mr. Griffin:

The U.S. Environmental Protection Agency Region 4 and the South Carolina Department of Health and Environmental Control (SC DHEC) have reviewed the Gravity Sewer Mains Preventative Maintenance Program (GSM-PMP) resubmitted by the City of Florence (the City) on June 14, 2016. This program was resubmitted pursuant to Paragraphs 58(c) and 45 of the referenced Consent Decree (CD) and the April 11, 2016, letter from the EPA and SC DHEC disapproving the initial submittal made on November 24, 2015.

The EPA, after consultation with SC DHEC, is again disapproving this resubmittal today, pursuant to Subparagraph 47 of the CD, based on the enclosed comments. The City needs to correct all the deficiencies identified in the comments and resubmit the GSM-PMP to the EPA and SC DHEC within 45 calendar days.

The EPA, in consultation with SC DHEC, will respond to the third submission either with an approval or with actions pursuant to Paragraph 47 of the CD, which may include unilateral correction of any deficiencies. If you have any questions, then please contact Mr. David Phillips at (404) 562-9773 or via email at: phillips.david@epa.gov.

Sincerely,

Dennis Sayre, Acting Chief
Municipal and Industrial Enforcement Section
Water Programs Enforcement Branch

Enclosure

cc: See Attached Mailing List

Mailing List:

Chief, Environmental Enforcement Section
U.S. Department of Justice

Office of Water Legal Support
U.S. Environmental Protection Agency, Region 4

Ms. Elizabeth A. Dieck
South Carolina Department of Health and Environmental Control

Mr. David Wilson
South Carolina Department of Health and Environmental Control

Mayor
Town of Timmonsville

Mr. Eleazer Carter, Esq.
The Carter Law Firm

Mr. James W. Peterson, Jr., Esq.
Clarke, Johnson, Peterson & McLean P.A.

EPA Region 4 and SC DHEC Comments (July 12, 2016)

Gravity Sewer Mains Preventative Maintenance Program (GSM-PMP) (resubmittal June 14, 2016)

Civil Action No. 4:13-CV-01522-RBH

1. Paragraph 58(c) of the Consent Decree: *The objective of this program shall be to establish a prioritized strategy for the routine inspection of the entire Gravity Sewer Main System.... appropriate inspection and cleaning rates for the Gravity Sewer Main System which are consistent with the EPA's guidance, "Collection Systems O&M Fact Sheet: Sewer Cleaning and Inspection....*
 - a. The resubmittal is targeted to the Timmonsville portion of the system only, and not to the entire Gravity Sewer Main System, as defined and required by the Consent Decree. The program resubmittal, and its associated frequencies, must be revised to address the entire City of Florence system. The baseline frequencies specified in the resubmittal (i.e., 20% of manholes inspected per year, 30% of sewers cleaned per year, and 10% of sewers inspected per year) would be acceptable GSM-PMP baseline frequencies if applied to the entire City system.
 - b. The Consent Decree requires "a calendar and map of the preventive maintenance schedules for specified areas of the gravity main system" that are missing from the resubmittal. Age-appropriate areas of the City likely exist that should receive higher frequencies of routine inspection/cleaning based on their rankings. As noted previously, the City needs to identify and address those areas in the GSM-PMP in the resubmittal. It is also possible that the necessary frequencies of preventative maintenance established in the GSM-PMP may decline over time as the system is rehabilitated.
 - c. The Consent Decree requires "procedures for maintaining and trending the data collected" from the inspection, cleaning, and root control programs. This procedural information appears to be missing from the resubmittal.
 - d. Since the baseline frequencies specified in the resubmittal equate to once per five years (manholes), and approximately once per three years (GSM cleaning), the corresponding schedule tables in the resubmittal should reflect these as the minimum frequencies. Less frequent options presently shown in Tables 1-2 and 2-1 should therefore be removed and the appropriate rankings reassigned.
2. Section 1, page 1-1. Last sentence should read: "will be inspected annually or more frequently as needed."
3. Section 1, page 1-5. The description inserted for GPS Coordinates needs additional instruction. The purpose of adding the GPS coordinates to the form is not just to capture coordinate data for new manholes. Denoting the coordinates for an existing manhole on the form also assists location of the manhole in the field, and allows verification the coordinates of record are accurate.
4. Section 2, page 2-2. Second to last sentence should read: "will be cleaned annually or more frequently as needed."
5. Section 2, page 2-5. The Consent Decree requires the GSM-PMP to contain routes. The only route information in the resubmittal is for the pump station inspections in Timmonsville (Exhibit F), but even this appears to be incomplete. Timmonsville has 15 stations per the location map (page v), but the exhibit identifies only 7 of the stations are ever inspected.

As noted in comment 1 above, the balance of the City system is not addressed in the resubmittal for the pump station route information. The resubmittal is also missing specific routes and/or prioritization schedules for areas to receive baseline preventative maintenance inspection and cleaning/root control.

6. Section 2, page 2-6. Typo: "outlined at the end of that section."

7. Section 3, page 3-4. Second to last paragraph should read: “will be CCTV inspected annually or more frequently as needed.”
8. Section 6, page 6-1. Details are lacking concerning the standard safety procedures that pertain to the CCTV, cleaning, and root control programs for the City. The City needs to develop and include and/or reference written standard procedures for the job-specific safety hazards, and derive them if they are not already developed. A blanket statement that procedures are provided to personnel is unacceptable; the program resubmittal needs to specify individual procedures and specify when and how each is provided.